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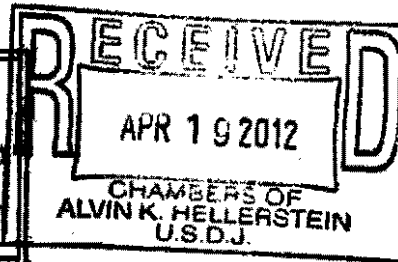
MEMBER OF THE BAR
OF ARIZONA ONLY

*The conf is adjourned
to Sep. 7, 2012, 10:00 a.m.
Plaintiff shall give notice of def't
upon, or following, service,
4/19/12
Alvin K. Hellerstein*

April 17, 2012

Honorable Alvin K. Hellerstein
U.S. District Judge
Room 1050
United States Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 4/20/12
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Re: Knoll, Inc. v. Nandy Furniture Industrial Co., 12 Civ. 678 (AKH)

Dear Judge Hellerstein,

We represent Plaintiff Knoll, Inc. in the above-referenced lawsuit against Nandy Furniture Industrial Co. We recently received a notice from chambers scheduling a conference for May 4, 2012 at 10:00 a.m. For the reasons set forth below, we respectfully request an adjournment of the pretrial conference.

Defendant Nandy Furniture Industrial Co. ("Nandy") is a Chinese company, with two locations in China. Process is therefore being served on Nandy pursuant to Fed. R. Civ. P. Rule 4(f)(h), which provides that a foreign corporation can be served "by any internationally agreed means of service that is reasonably calculated to give notice, such as those authorized by the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents."

The Hague Convention allows for service on Contracting States (which includes China) by a designated Central Authority. In 2009, the U.S. Department of Justice awarded Process Forwarding International/ABC Legal ("PFI") the contract for service of process under the Hague and Inter-American service conventions. PFI therefore acts as the Central Authority for international service purposes under the Hague Convention. Accordingly, we have recruited PFI to effect service on Nandy in China.

PFI advised that our service request on Nandy was in progress on February 24, 2012, and that service is generally effected within six months of PFI's receipt of the required documents. We therefore expect to receive proof of service on or around August 24, 2012. As the court is no doubt aware, the 120-day time limit for service provided by Fed. R. Civ. P. 4(m) does not apply to service in a foreign country under Rule 4(f).

Hon. Alvin K. Hellerstein
April 17, 2012
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We submit that this is the first request for extension. Understandably, Nandy has not consented to this request for adjournment because it has not yet been served. No conference dates other than the original date have been scheduled.

For the above reasons, we respectfully request a 120-day adjournment of the pretrial conference until September 4, 2012.

Respectfully submitted,

GOTTLIEB, RACKMAN & REISMAN, P.C.



George Gottlieb

cc: Nandy Furniture Industrial Co.

SO ORDERED:

U.S. District Judge Alvin K. Hellerstein

CERTIFICATION OF SERVICE

I hereby certify that a true copy of the foregoing letter to Honorable Alvin K. Hellerstein was served by Federal Express this 18th day of April 2012 on Defendant, as follows:

President
Nandy Furniture Industrial Co.
No. 16, Fuhua Rd.
Chongkou Industry Park, Longjiang Town
Shunde District, Foshan City
Guangdong Province
China

No. 1 Xijun Rd.
Chongkou Industry Park, Longjiang Town
Shunde District, Foshan City
Guangdong Province
China

Dated: April 18, 2012

Rachel M. Weiss

Judge wrote:

“The conference is adjourned to September 7, 2012, 10:00 a.m.
Plaintiff shall give notice to defendant upon, or following, service.

4/19/12

Alvin K. Hellerstein”